

## REMARKS

### I. Introduction

In response to the Office Action dated April 25, 2006, claims 1, 3, 4 and 6-14 have been amended. Claims 1-14 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Non-Art Rejections

On page (2) of the Office Action, claims 3-5 were objected to because of the term "the friction pick module" does not have an antecedent basis.

Applicants' attorney has amended claim 3 to overcome this objection.

### III. Prior Art Rejections

#### A. The Office Action Rejections

On pages (2)-(3) of the Office Action, claims 12 and 14 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,484,380 (Graef). On pages (3)-(9) of the Office Action, claims 1-11 and 13 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef and U.S. Patent No. 6,029,971 (Lynch).

Applicants' attorney respectfully traverses these rejections.

#### B. The Graef Reference

Graef describes an automated banking machine (10) including sheet dispensing mechanisms (34, 36, 38, 40). Each sheet dispensing mechanism includes a picking member (72). The picking member rotates, with each rotation generally causing one sheet to be picked from a stack (42) of sheets. The picking member includes movable engaging portions supported on arcuate segments (128, 144). The engaging portions move radially outward to apply additional moving force to an end note bound in the stack responsive to movement of the picking member exceeding the movement of the end note. Sheets are carried in the machine by a transport (54) including a plurality of belt flights (174, 176, 178). Sheets are carried between the belt flights and projecting member portions (180, 182). At least one of the belt flights includes a plurality of longitudinally spaced projections (194, 200, 204, 207) on a sheet engaging surface thereof. The

projections provide improved engagement with sheets moving in the transport enabling more reliable movement of sheets.

**C. The Lynch Reference**

Lynch describes a belt displacement operation periodically carried by the pick mechanism 11 of a sheet feeding apparatus, when the number of sheets fed has reaches a predetermined value. The motor 34 is driven in reverse for a predetermined time, so as to cause rotation of the belt 28 in the opposite direction to that during feeding. Since the pick pulley 26 is supported on the shaft 38 by means of a one-way clutch 40 so that it does not rotate during the reverse rotation of the belt 28, displacement of the belt 28 occurs relative to the pick pulley 26, so that in subsequent pick operations, a different portion of the belt 28 engages the stack 18 so as to pick a sheet, than had displacement of the belt 28 not occurred. This reduces the risk of localized portions of the belt 28 becoming more worn than others, due to more frequent engagement with the stack 18.

**D. The Applicants' Invention is Patentable Over the References**

**1. The rejection of claims 12 and 14 under 35 U.S.C. §102(e) as being anticipated by Graef**

Applicants' independent claim 12 distinguishes over Graef because it recites a media module for use in a self-service terminal, the media module comprising: (a) means defining a media transport path; (b) a plurality of media containers; and (c) a friction pick mechanism associated with each media container within the media module for picking media from the media container and transferring the picked media to the media dispense path for transporting the picked media from the media module.

Similarly, Applicants' independent claim 14 distinguishes over Graef because it recites a method of dispensing media from a self-service terminal, the method comprising the steps of: (a) selectively removing media from one of a plurality of media containers disposed within a media module, wherein each of the media containers within the media module include a friction pick mechanism associated with each media container for picking media from the media container and transferring the picked media to a media dispense path for removing the picked media from the media module; and (b) presenting the removed media to a user.

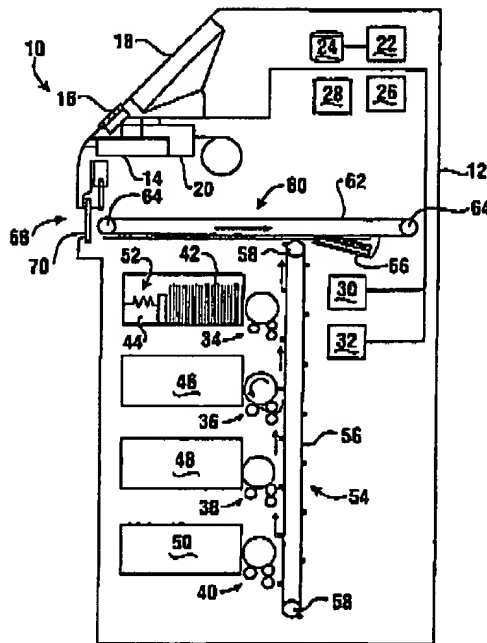
The Office Action, on the other hand, states that Applicants' claims 12 and 14 are anticipated by Graef:

Graef discloses a media-dispensing module for use in a self service terminal, the media dispensing module comprising:

- Means defining a media dispense path (Fig 1, See arrows related to Refs 54, 56, 60 and 62)
- A plurality of media storage locations (Fig 1, Refs 44, 46, 48 and 50)
- A friction pick mechanism associated with each media storage location for picking media from the media storage location (Fig 1, Refs 34, 36, 38, and 40) and transferring picked media to the media dispense path (Fig 1, Refs 54, 56) for transporting media from the media dispensing module (Fig 1, Refs 60, 62, 68)

Applicants' attorney disagrees.

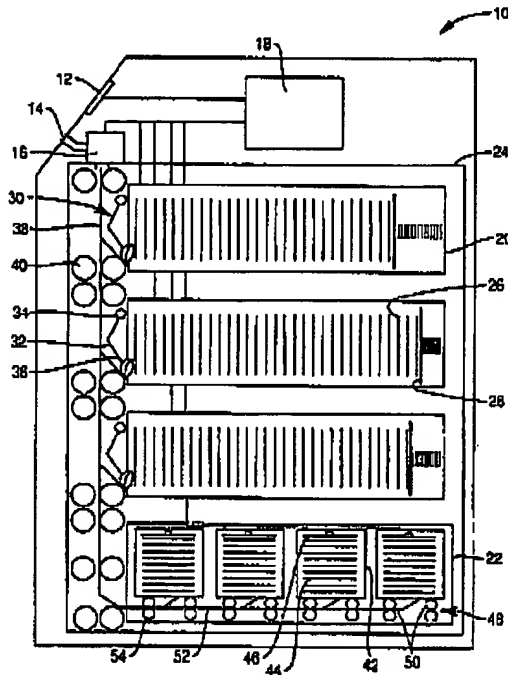
For example, consider the canisters labeled as 44, 46, 48 and 50 in FIG. 1 of Graef:



**FIG. 1**

The Office Action states that these canisters are analogous to a plurality of media storage locations, as originally recited in Applicants' claims.

However, consider the media module 22 of Applicants' FIG. 1, which contains a plurality of media containers 42 with a friction pick mechanism 48 associated with each media container 42.



The canisters 44, 46, 48 and 50 of Graef are instead each analogous to the media module 20 shown in Applicants' FIG. 1, rather than the media module 22 with its plurality of media containers 42. Specifically, none of the canisters 44, 46, 48 and 50 shown in FIG. 1 of Graef contain a plurality of media containers 42, or have pick mechanisms 48 associated with each media container 42.

The media module 22 enables the self service terminal to dispense fewer media items without wasting space by providing a plurality of media containers 42 within the module 22, each with its own pick mechanism 48.

Thus, Applicants' attorney submits that independent claims 12 and 14 are allowable over Graef. Further, dependent claim 13 is submitted to be allowable over Graef in the same manner, because it is dependent on independent claim 12, and thus contains all the limitations of

independent claim 12. In addition, dependent claim 13 recites additional novel elements not shown by Graef.

2. The rejection of claims 1-11 and 13 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef and Lynch

Applicants' independent claim 1 discloses a self-service terminal comprising: a plurality of media modules, each module being operatively associated with a pick mechanism for picking media from the module and transferring the picked media to a media dispense path, at least one module being associated with a vacuum pick mechanism, and at least one other module being associated with a friction pick mechanism.

Applicants' independent claim 6 discloses a self-service terminal comprising: means defining a media dispense path; a vacuum pick mechanism; a friction pick mechanism; and a plurality of media modules, each media module being operatively associated with a pick mechanism for picking media from the module and transferring the picked media to the media dispense path, at least one media module being associated with the vacuum pick mechanism and at least one other media module being associated with the friction pick mechanism.

The Office Action admits Graef does not teach the elements of claims 1 and 6 directed to at least one module being associated with a vacuum pick mechanism. However, the Office Action, on page 4, states that:

Lynch discloses that sheet feeding apparatus such as the one disclosed by Graef "are commonly of either the vacuum pick or friction pick type and depending on the type of media involved cites the advantages and disadvantages for each (column 1, lines 5-20). Some media, as Lynch points out is better served with a friction mechanism (media that need a high feed rate), while other media would be better served with a vacuum mechanism (high porous). Thus it would have been obvious to anyone of ordinary skill at the time of invention to include these teachings of Lynch to the disclosure of Graef so that an ATM containing multiple media types can distribute the different types of media in the most efficient and practical way possible.

Applicants' attorney asserts that it is not obvious to combine a vacuum pick and friction pick in one self service terminal.

Conventionally, a self service terminal will employ only one type of pick mechanism (see Applicants' specification at page 1, line 21). Lynch confirms this by teaching that sheet feeding

apparatus may be either vacuum type or friction type, but not both. Specifically, Lynch does not teach that both friction type and vacuum type apparatus are present in the same self service machine.

Consequently, the Office Action's assertion applies hindsight and then assumes obviousness, when stating that the combination would have been obvious "so that an ATM containing multiple media types, can distribute the different types of media in the most efficient and practical way possible. In fact, the combination of Graef and Lynch would teach away from Applicants' claims 1 and 6.

For example, Lynch teaches selecting a picking mechanism based on the speed of dispensing desired, the simplicity of construction, or the porosity of the media (see Lynch at col. 1, lines 13-16). Since most media being dispensed is non-porous (such as cards or bank notes), Lynch would teach using a vacuum type pick for all kinds of media, cards and bank notes alike, not a friction type pick. Therefore, a person of ordinary skill in the art, upon reading Lynch, would construct a self service terminal with one kind of picking mechanism for different types of media, wherein the picking mechanism is a vacuum type pick.

Moreover, modifying Graef in view of Lynch would change the principle of operation of Graef. Consider that Lynch teaches using a vacuum pick mechanism for handling non-porous media, such as bank notes (see Lynch, at col. 1, lines 10-13), whereas Graef teaches the use of a friction pick mechanism for handling bank notes (see the Office Action at page 3, as well as Graef at the Abstract and col. 7, lines 25-45).

Applicants' claims, on the other hand, recite a self service terminal having both kinds of picking mechanisms – namely, a vacuum pick mechanism and a friction pick mechanism.

Thus, Applicants' attorney submits that independent claims 1 and 6 are allowable over Graef in view of Lynch. Further, dependent claims 2-5 and 7-10 are submitted to be allowable over Graef in view of Lynch in the same manner, because they are dependent on independent claims 1, and 6, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5 and 7-10 recite additional novel elements not shown by Graef in view of Lynch.

Dependent claims 2 and 7 recite a self-service terminal of claim 1 and 6, respectively, wherein the modules are removable and interchangeable. The Office Action asserts that this is obvious, but admits that neither reference teaches these limitations. Applicants' attorney also

submits that these limitations are not obvious in the context of having both types of pick mechanisms associated with the media modules, and yet the media modules still being interchangeable.

Dependent claims 3 and 8 recite a self-service terminal of claims 1 and 6, respectively, wherein the friction pick mechanism is contained within the friction pick module. The Office Action incorrectly states, on page (5), that Graef teaches a friction picking mechanism contained within a friction picking module. Rather, Graef teaches a sheet dispensing mechanism adjacent to canisters for housing sheets (see Graef at col. 7, lines 25-45 and FIG. 1).

Dependent claims 4 and 9 recite a self-service terminal of claims 3 and 8, respectively, wherein the friction pick module comprises a plurality of friction pick units, each unit including a media container and a friction pick mechanism. The Office Action, on page (5), incorrectly states that Graef teaches a friction pick module, even though the Office Action previously admitted that Graef does not teach a friction pick module. Nor does Graef teach a friction pick module comprising a plurality of friction pick units, labeled as 42 in Applicants' FIG. 1 shown above. Instead, the Office Action states that canisters 44, 46, 48 and 50 in Graef's FIG. 1 are equivalent to a media container. However, as noted above, the canisters of Graef are not equivalent to media containers, and thus Graef does not teach or suggest a plurality of friction pick units, each unit including a media container and a friction pick mechanism.

Dependent claims 5 and 10 recite the self-service terminal of claims 4 and 9, respectively, wherein the friction pick units share a common media exit path which is within the media module and leads to the media dispense path. Graef does not teach a media module as recited in Applicants' claims 4 and 9, and there is no common media exit path within a canister of Graef.

Applicants' independent claim 11 recites a self-service terminal comprising means defining a media dispense path, and a number of removable media modules, at least one media module including a plurality of media containers and a friction pick mechanism operatively associated with each media container for picking media from the media container and transferring picked media to the media transport path. As noted above, none of these elements are taught or suggested by Graef. Moreover, Lynch is noted only for teaching removable modules, but Lynch does not disclose the same media modules or media containers as recited in Applicants' claim 11.

Dependent claim 13 teaches a media dispensing module according to claim 12, further comprising means for enabling the media dispensing module to be removable and interchangeable in a self-service terminal. The Office Action admits the references do not disclose modules that are interchangeable, but argues it would be obvious to one of ordinary skill in the art to make interchangeable modules. Applicants' attorney submits that, since a self service terminal with both vacuum pick and friction pick modules did not exist before Applicants' invention, it is not obvious to make a friction pick module and a vacuum pick module interchangeable with each other.

#### IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.


Respectfully submitted,

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